

July 26, 2022

BY ECF

The Hon. A. David Copperthite
United States District Court for the District of Maryland
101 West Lombard Street, 8B
Baltimore, Maryland 21201

Re: *Alfred Chestnut, et al. v. Donald Kincaid, et al.*
Civil Action No. LKG-20-2342

Dear Judge Copperthite:

Pursuant to your Letter Order of August 9, 2021 (ECF No. 52), Plaintiffs and the Baltimore Police Department (“BPD”) write regarding a discovery dispute that the parties have been unable to resolve despite good-faith efforts.

Plaintiffs seek attorneys’ fees from BPD as a Rule 37 sanction following the July 8, 2022 deposition of Donald Kincaid as BPD’s 30(b)(6) witness on Topic 1. *See* Fed. R. Civ. P. 37; *see also* Loc. R. App. A, Guideline 1.c (describing requests for sanctions under Rule 37 as a “discovery dispute[]”). Counsel for Plaintiffs, BPD, and Mr. Kincaid met and conferred on July 20 but have reached an impasse and seek this Court’s guidance.

Plaintiffs and BPD will set out their respective positions in submissions, to be filed within 24 hours of this letter.

Respectfully,

/s/

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